

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

BRYNNE SOUKUP
Plaintiff

v.

**FRONTIER AIRLINES, INC. and
FLIGHT SERVICES & SYSTEMS, LLC**
Defendants

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CIVIL ACTION NO. 1:20-CV-648-RP

MOTION FOR ADMISSION *PRO HAC VICE*

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Thomas P. Marotta, applicant herein, and moves this Court to grant admission to the United States District Court for the Western District of Texas *pro hac vice* to represent Flight Services & Systems, LLC in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm of LoPresti, Marcovy & Marotta, LLP, with offices at:

1468 W. 9th Street
Suite 420
Cleveland, Ohio 44113
Telephone: (216) 241-7740
Facsimile: (216) 241- 6031
Email: tpm@lmm-llp.com

2. Since November 6, 1981, Applicant has been and presently is a member of and in good standing with the Bar of the State of Ohio. Applicant's bar license number is 0024884.
3. Applicant has been admitted to practice before the following courts:

Court:

Admission Date:

USCA 6th Circuit
N. D. Ohio
S.D. Ohio

4/4/86
12/30/82
6/2005

4. Applicant is presently a member in good standing of the bars of the courts listed above.
5. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court.
6. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses.
7. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.
8. Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

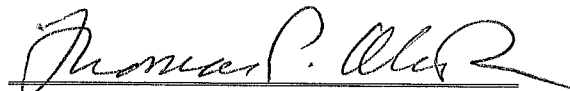
H. Michael Bush
1100 Poydras Street, Suite 2300
New Orleans, LA 70163
Telephone: (504) 585-7271

9. Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 *pro hac vice* fee in compliance with Local Court Rule AT-1(f)(2) [checks made payable to: **Clerk, U.S. District Court**].
10. Should the Court grant applicant's motion, Applicant shall register as a filing user within 10 days of this order, pursuant to Administrative Policies and Procedures for Electronic Filing in Civil and Criminal Cases in the Western District of Texas.

Wherefore, Applicant prays that this Court enter an order permitting the admission of Thomas P. Marotta to the Western District of Texas *pro hac vice* for this case only.

Respectfully submitted,

Thomas P. Marotta


[signature]

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this ____ day of _____, 2021.

Thomas P. Marotta


[Signature]